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16 Attorneys for Defendant
17 Hartford Life and Accident Insurance Company

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 ALEXANDER PAMINTUAN,

21 Plaintiff,

22 v.

23 HARTFORD LIFE AND ACCIDENT
24 INSURANCE COMPANY, as Claims
25 Administrator of the Life Care Centers of
26 America, Inc. Welfare Benefits Plan; DOES I
27 through V; and ROE CORPORATIONS I
28 thru V inclusive,

Defendants.

Case No. 2:21-cv-01365-RFB-NJK

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[First Request]

29 The parties, Plaintiff Alexander Pamintuan ("Plaintiff"), through his counsel, Julie A.
30 Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident
31 Insurance Company ("Hartford"), through its counsel, Michael R. Brooks of Hutchison & Steffen
32 PLLC and Michael B. Bernacchi of Burke, Williams & Sorensen, LLP, hereby respectfully
33

1 submit this Stipulation, Request and Order to Extend Time to Answer or Otherwise Respond to
 2 Plaintiff's Complaint (the "Stipulation"). This Stipulation is made in accordance with Local
 3 Rules IA 6-1, IA 6-2, and II 7-1. This is the first request for an extension of time to file an
 4 answer or otherwise respond to Plaintiff's Complaint.

5 Hartford was served with Plaintiff's Complaint on August 9, 2021, making its current
 6 responsive pleading due on or before August 30, 2021. The instant extension is requested as
 7 Hartford's counsel requires additional time to review their client's file in order to prepare a
 8 meaningful responsive pleading to Plaintiff's Complaint and Hartford's lead counsel is also in the
 9 process of petitioning the Court for permission to practice in this particular case. He has initiated
 10 his petition for permission to practice in compliance with Local Rule IA 11-2 and anticipates
 11 completion within 14 days.

12 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
 13 respectfully requests this Court grant an extension of time, up to and including **September 29,**
 14 **2021**, for Hartford to file an answer or otherwise respond to Plaintiff's Complaint. By entering
 15 into this Stipulation, none of the parties waive any rights they have under statute, law or rule with
 16 respect to Plaintiff's Complaint.

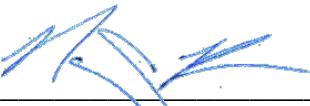
17 DATED this 24th day of August, 2021.
 18
 19 LAW OFFICE OF JULIE A. MERSCH

20 By: /s/ Julie A. Mersch
 21 Julie A. Mersch
 22 1100 East Bridger Avenue
 23 Las Vegas, NV 89101

24 Attorney for Plaintiff
 25 Alexander Pamintuan

26 IT IS SO ORDERED.

27 Dated: August 26, 2021

28 

Nancy J. Koppe
 29 United States Magistrate Judge

DATED this 25th day of August, 2021.
 HUTCHISON & STEFFEN, PLLC

By: /s/ Michael R. Brooks
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 Hartford Life And Accident Insurance
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